

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRET T. CULVER,	:	
	:	
Plaintiff	:	
	:	
v.	:	No. 1:01-CV-0904
	:	(Judge Kane)
COMMONWEALTH OF	:	
PENNSYLVANIA, et al.,	:	
	:	(Electronically Filed)
Defendants	:	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION TO COMPEL DISCOVERY**

EXHIBIT C

Defendant Mooney's Responses to First Set of Interrogatories

DATE: September 29, 2003

Exhibit C

cf
4/3

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRET T. CULVER,	:	
	:	
Plaintiff	:	
	:	
v.	:	No. 1:01-CV-0904
	:	(Judge Kane)
T. E. MIKNICH, et al.,	:	
	:	
Defendants	:	

**DEFENDANT MOONEY'S RESPONSES
TO PLAINTIFF'S INTERROGATORIES**

Defendant, Vincent Mooney, through his attorneys, respond to plaintiff's interrogatories as follows:

1. What is your full name and address ?

ANSWER:

Vincent Mooney
State Correctional Institution at Mahanoy
Frackville, Pennsylvania

2. Have you been employed as a D.O.C. employee during the time period of December of 1999 through February 2002 ?

ANSWER: Yes.

3. On the following dates of September 5, 2000 through September 22, 2000 were you on duty as an employee of the D.O.C at the S.C.I. at Mahanoy?

ANSWER:

September 5- 8, 2000, I was not at S.C.I. Mahanoy. September 11-15, and September 18-22, 2000 I was on duty at S.C.I. Mahanoy.

4. If yes to # 3,
 - (a) Cite each day you reported for duties at the facility;
 - (b) Cite what time of day you started your duties each day present;
 - (c) Cite what time of day you finished your duties each day present;

ANSWER:

- (a) See response to Interrogatory No. 3.
- (b) 8:00 A.M.
- (c) 4:00 P.M.

5. During your employ at S.C.I. Mahanoy facility, have you ever received or reviewed any reports, complaints, or correspondence documents from the plaintiff, or from any other person on relevant or related issues or subject matter out-lined in this Complaint Action 1:01-CV-00904 ?

ANSWER:

Yes.

6. If yes to # 5,

(a) Cite dates of documents, notices, correspondence, reports directed to your authority by plaintiff or other persons, including the subject matter of each document, report, correspondence, and notice to your authority;

(b) Cite your responses and/or action taken on issue of notification to your authority, and on what dates responses or actions were taken;

(c) Cite any protection or relief established or enforced by your authority for the plaintiff, including dates of any and all action taken on any issue presented or directed to your authority for attention.

ANSWER: OBJECTION. The defendant objects to this interrogatory as overbroad and as seeking documents that are privileged. Without waiving that objection, see Exhibit "A" attached.

7. At any time during the time period of September 5, 200 [sic] through September 22, 2000 did you at any time (working/non-working) speak with or communicate with defendant Kevin Kane concerning the plaintiff (in any manner), conferring/advising/alluding any thought, implication or action to Kevin Kane.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague and overbroad and irrelevant to the complaint. Without waiving that objection, see Exhibit "A" attached.

8. If yes to # 7, cite dates and subject matter of any and all interactions (verbal, written or other) made or conveyed to defendant Kevin Kane.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague and overbroad and irrelevant to the complaint. Without waiving that objection, see Exhibit "A" attached.

9. At any time during your employ by the D.O.C. have you ever been cited, reprimanded, re-assigned or re-located pursuant to reports, complaints, incidents or allegations of misconduct and/or violations against others filed on your person (alleged or confirmed)?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as overbroad and irrelevant to the complaint. Without waiving that objection, No.

10. If yes to # 9, cite dates and describe what incidents or violations you were cited or reported for.

ANSWER: N/A.

11. During your term of employment at S.C.I. Mahanoy have you ever received communications of orders/advice/recommendations from affiliate official personnel (staff) or any official authority of the D.O.C. pertaining to the plaintiff on any subject matter during the plaintiff's detainment at the S.C.I. Mahanoy facility ?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

12. If yes to # 11,

- (a) Cite name and title of correspondence;
- (b) Cite date and subject matter of each correspondence/communication;
- (c) Produce discovery of any and all record documentation of information received related to or pertaining to plaintiff

ANSWER: N/A.

13. During your term of employment at the S.C.I. Mahanoy facility have any other employees affiliated to your authority prepared and/or filed into record any information, report, allegation, comment, statements recommendations, or evaluations on the plaintiff incorporating assistance, input or information from your authority 12-01-1999 through February of 2000?

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

14. If yes to # 13,
- (a) Cite name, badge or identification number, and present address of each person involved in any said document/report;
 - (b) Cite name, badge or identification number, and present address of the persons for whom each document/communication/report was prepared and directed;
 - (c) The date, time and place where each document/report/communication was prepared;
 - (d) Explain the subject matter contents of each document/report/communication.

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

15. Have you ever reviewed, had possession of, or had knowledge of any video security monitoring of the day events of 10-12-00 (R.H.U. L-5 D-Pod), and 01-11-02 (Medical Building Lobby area) ?

ANSWER: No. In addition, the defendant OBJECTS to this interrogatory as it seeks information concerning 01-11-02, which is irrelevant to plaintiff's complaint.

16. Have you at any time referred to or reviewed any video monitoring recordings of 10-13-00 (L-5 D-Pod), or 01-11-02 (Medical Building Lobby area), and have you has any involvement with documentation, storage, or decisions concerning the record, storage, or documentation of video security monitoring recordings, namely in relation or concern to any and all tapes/recordings of the dates 10-13-00 (L-5 D-Pod), or 01-11-02 (Medical Building Lobby area)?

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint. Without waiving that objection, the defendant did not review any videos of L-5 D-Pod for October 13, 2000, nor was he involved in the storage of the video security monitoring recordings.

17. If yes to # 16,

(a) Explain any input, action, or involvement you have had concerning to or relative to the record, documentation, storage, treatment or disposition of any and all video security monitoring tapes/recordings for 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area) ?

(b) Cite any persons involved or knowledgeable of any video security monitoring recordings for the days events of 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area)?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint. Without waiving that objection, the defendant did not review any videos of L-5 D-Pod for October 13, 2000, nor was he involved in the storage or disposition of the video security monitoring recordings.

18. Was your authority or department notified by any person or official authority to retain or discard (erase/destroy) any video security monitoring tapes or recordings for the dates of 10-13-00 and 01-11-02?

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint. Without waiving that objection, no.

19. If yes to #18, cite name, title badge or identification number and present address of any persons, implicated, or associated with any knowledge or facet to care, treatment, documentation, storage, record of any and all video security monitoring

tapes/recordings for the dates 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area) .

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, confusing, overbroad and irrelevant to the complaint.

20. Disclose discovery of all video security monitoring tapes/recordings for the dates of 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area) .

ANSWER: No video tapes exist for 10-13-00 (L-5 D-Pod), and 01-11-02 (Medical Building Lobby area). The Medical Building Lobby area is not videoed by the video security monitoring system.

21. Cite name and address or otherwise identify any person who, to your knowledge or the knowledge of your agents or attorneys, purport to have knowledge or involvement of actions or facts relevant to the issues or subject matter described in these interrogatories.

ANSWER: OBJECTION. The defendant OBJECTS to this interrogatory as vague, overbroad and irrelevant to the complaint. Without waiving that objection, see documents attached as Exhibit "A" as containing the names of individuals who have knowledge concerning the allegations contained in plaintiff's complaint.

22. Do you, your attorneys, or any other person employed by the D.O.C. have possession or knowledge of any documents, records, reports made in the

ordinary course or business, other printed or documentary material, photographs, drawings, video, information, or other tangible objects that are relevant/related to the subject matter described in these interrogatories.

ANSWER: OBJECTION. The defendant **OBJECTS** to this interrogatory as vague, overbroad and irrelevant to plaintiff's claim. Without waiving that objection, at this the defendants have identified those persons and documents attached as Exhibit "A".

23. If yes to # 22, state:

- (a) Cite name and description of each item;
- (b) Cite name and address of each person who made, prepared, or took such item;
- (c) Cite name and address of the present custodian of each such item;
- (d) Cite date, time and place where each item was made/formulated/prepared/taken;
- (e) Explain method by, and purpose for which each item was made/prepared/taken;
- (f) Explain manner in which each such item is relevant tot he issues/conduct/incident described in theses interrogatories ?

ANSWER: OBJECTION. The defendant **OBJECTS** to this interrogatory as vague, overbroad and irrelevant to plaintiff's claim. Without waiving that

objection, at this the defendants have identified those persons and documents attached as Exhibit "A".

23. Do you, any other employees, your attorneys have any knowledge of any item mentioned or described being altered removed, destroyed, erased, or lost in any manner?

ANSWER: **OBJECTION.** The defendant OBJECTS to this interrogatory as vague, overbroad and irrelevant to plaintiff's claim. The defendant has no idea what plaintiff is referring to as "item mentioned or described."

24. If yes to # 23,

(a) Explain;

(c) Cite instances, items, dates;

(d) Cite names and address of persons involved or who have knowledge relevant events, items facts.

ANSWER: See Response to Interrogatory No. 23.

Respectfully submitted,

D. MICHAEL FISHER
Attorney General

By:

A handwritten signature in black ink, appearing to read "Maryanne M. Lewis", is written over a horizontal line.

MARYANNE M. LEWIS
Deputy Attorney General

SUSAN J. FORNEY
Chief Deputy Attorney General
Chief, Litigation Section

Office of Attorney General
15th Flr., Strawberry Sq.
Harrisburg, PA 17120
FAX: (717) 772-4526
Direct Dial: (717) 787-9719
DATE: April 3, 2002

SCI MAHANAY SUPT OFF

☎ 5706213138

04/02/02 15:59 ☐ :02/03 NO:678

FILE No.587 04/02 '02 13:27 :OFFICE OF ATTY. GENERAL

FAX:7 724526

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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRET T. CULVER,**Plaintiff****v.****T. E. MIKNICH, et al.,****Defendants**:
:
:
:
:
:
:
:
:
:**No. 1:01-CV-0904
(Judge Kane)**

VERIFICATION OF VINCENT MOONEY

I, VINCENT MOONEY hereby states, he has read the responses to plaintiff's interrogatories, and that the facts set forth therein are true and correct to the best of his knowledge, information, and belief.

4/2/02
DATE



VINCENT MOONEY

MOONEY - EXHIBIT "A"

RP

FORM DC-141 Rev. 6-84		PART I		COMMONWEALTH OF PENNSYLVANIA		A 212770	
<input checked="" type="checkbox"/> MISCONDUCT REPORT <input type="checkbox"/> OTHER		DEPARTMENT OF CORRECTIONS					
DC Number DD-3483	Name Colver, Brett	Institution SCI-MAH	Incident Time 24 Hr. Base 1515	Incident Date 9/5/00	Date of Report 9/18/00		
Quarters RHU	Place of Incident Security Office						
OTHER INMATES OR STAFF INVOLVED OR WITNESSES (CHECK I OR W)							
DC Number	Name	I	W	DC Number	Name	I	W
Staff	CDI Brennan		<input checked="" type="checkbox"/>	Staff	Superintendent Shannon		<input checked="" type="checkbox"/>
Staff	CO1 Engle		<input checked="" type="checkbox"/>				
Staff	CO1 Mikulich	<input checked="" type="checkbox"/>					
MISCONDUCT CHARGE OR OTHER ACTION A. Class # 15. Threatening an Employee or their Family with bodily harm.							
STAFF MEMBER'S VERSION On September 5, 2000 Superintendent Shannon received a Request Slip from DD-3483 Colver. In the Request Slip inmate Colver alleged that Co Mikulich was harassing and stalking him. Colver further stated "I cannot be held accountable for my actions on my part that might occur related to these situations". On 9/11/00 I attempted to interview inmate Colver concerning his threatening statement, Colver refused to cooperate and explain his statement, therefore his statement is considered a threat to Co Mikulich. The difference in the original date of incident and report date was due to this reporter being out of the institution until 9/11/00. Misconduct A212769 was dismissed without prejudice resulting in a new date of report of 9/18/00.							
IMMEDIATE ACTION TAKEN AND REASON continue confinement in the L-5 pending further action by the hearing examiner.							
PRE-HEARING CONFINEMENT							
IF YES							
<input type="checkbox"/> YES	TIME	DATE					
<input checked="" type="checkbox"/> NO	N/A	N/A					
<input checked="" type="checkbox"/> REQUEST FOR WITNESSES AND REPRESENTATION				<input checked="" type="checkbox"/> INMATE'S VERSION			
REPORTING STAFF MEMBER SIGNATURE AND TITLE Mooney, Vincent F. Intelligence Captain		ACTION REVIEWED AND APPROVED BY RANKING C.O. ON DUTY CO-1 MB			DATE AND TIME INMATE GIVEN COPY DATE 9-18-00 TIME 24 HOUR BASE 1915		
YOUR HEARING MAY BE SCHEDULED ANY TIME AFTER DATE 9-20-00 TIME 0800				Misconduct Category <input checked="" type="checkbox"/> CLASS 1 <input type="checkbox"/> CLASS 2		Signature of Person Serving Notice CO' Mikulich	
NOTICE TO INMATE You are scheduled for a hearing on this allegation on the date and the time indicated or as soon thereafter as possible. You may remain silent, if you wish. Anything you say will be used against you both at the misconduct hearing and in a court of law if this matter is referred for criminal prosecution. If you choose to remain silent, the hearing committee/examiner may use your silence as evidence against you. If you indicate that you wish to remain silent, you will be asked no further questions. If you are found guilty of a Class 1 misconduct, any pre-release status you have will be revoked.							

DC-141 Rev. 6-84 DISCIPLINARY HEARING REPORT		PART II B COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS	
DC Number 003483	Name Culver	Institution SCMNH	Hearing Date 9-22-00
Hearing Time 1040		No. from Part I A212770	
INMATE PLEA <input type="checkbox"/> Guilty <input checked="" type="checkbox"/> Not Guilty		Verdict <input checked="" type="checkbox"/> Guilty <input type="checkbox"/> Not Guilty	
CHARGES A#15. THROAT - not self			
FINDINGS OF FACT, VERDICT, AND SANCTIONS IMPOSED <p style="font-size: 1.2em;">Culver submits a version story essentially that he did author the attached copy of the request chg. He did make the statement that "I cannot be held responsible or accountable for any action on my part that might occur related to this situation..." But But he does it see this as a threat.</p> <p style="font-size: 1.2em;">I find for the staff report over Culver's denial that the statement he authored in the attached request chg, that he would not be held responsible for any any action on his part, as a threat to staff. I find he was telling the statement as a threat. I find him guilty of this threat chg.</p> <p style="font-size: 1.5em; text-align: center;">Sancti. 90 of DC 9-11-00 12-9-00</p>			
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		The inmate has heard the decision and has been told the reason for it and what will happen. The circumstances of the charge have been read and fully explained to the inmate. The opportunity to have the inmate's version reported as part of the record was given. The inmate has been advised that within 15 days a request for a formal review may be submitted and that this request must contain specific reasons for the review.	
NAME(S) OF HEARING EXAMINER/COMMITTEE (TYPED OR PRINTED) J.K. KANE		Hearing Report and all appended information must be signed. Signature indicates finished report with appendices. SIGNATURE OF HEARING EXAMINER/COORDINATOR 	

written for attached
 & submitted
 SEE APPENDICES
 copy of Request chg
 attached + Staff report
 Culver

DC-141 Rev. 6-84		PART II A		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS	
INMATE REQUEST FOR REPRESENTATION AND WITNESSES					
DC Number DD3483	Name CULVER, BRETT	Institution SCI MAH	Date 9-18-00	Number as on Part I A212770	
<p>You have been charged with a misconduct. You may request assistance and/or witnesses to appear at your hearing by completing the section(s) below. <i>With Assistance by Attorney/Case involves Official Criminal Intent.</i></p> <p>In order to have assistance or witnesses at your hearing, you must complete this form and present all copies to one of your housing officers no later than 9:00 a.m. the first working day after you receive notice of the misconduct.</p>					
<p>Assistance: <input type="checkbox"/> I do not request assistance <input checked="" type="checkbox"/> I request assistance by <u>Kathy R. Stuber Esquire</u> (The person requested must be willing to assist you)</p> <p style="text-align: right;"><i>PA. Institutional Law Project 924 Cherry St. Philadelphia PA</i></p>					
<p>Witnesses: You may request witnesses in accord with DC-ADM 801. State the relevance and importance of the testimony the witness will give.</p> <p style="text-align: right;"><i>no, Culver appears able to understand the process</i></p>					
<p>1. Name of Witness: <u>Original Document (R. Shuman 9-5-00) Stamp dated to V. Mooney Office receipt</u> Why is this person's testimony relevant and important? <i>V. Mooney rendering of statement in A212770 is altered and not correct to the original text. Also V. Mooney twists this partial statement out of the context present in the original Office Date Stamp for Evidence.</i></p>			<p style="text-align: center;">DO NOT WRITE IN THIS SECTION For Use by Hearing Examiner</p> <p>Witness permitted? <input type="checkbox"/> If not, why not?</p>		
<p>2. Name of Witness: <u>Work Attendance Tracking Record for V. Mooney</u> Why is this person's testimony relevant and important? <i>V. Mooney enters (imphs) evidence by testimony in report that he had not been at this institution 9-5-00 to 9-11-00 for rational, that this charge could not be written-up (outside his authority and presence).</i></p>			<p>Witness permitted? <input type="checkbox"/> If not, why not? <i>no, no one requested specifically</i></p>		
<p>3. Name of Witness: <u>Whoever was V. Mooney's replacement during absence.</u> Why is this person's testimony relevant and important? <i>To explain why nobody at this Prison absence 9-5-00 made found any reason, or could not take action if this violation (alleged) existed. And why no violation was found by anyone for the 6 days (six days) V. Mooney alleges he was not at this institution.</i></p>			<p>Witness permitted? <input type="checkbox"/> If not, why not?</p>		
<p><u>Brett Culver</u> Inmate's Signature</p>					
<p>This section to be completed by Housing Officer only</p> <p>Received completed form <u>0645</u> hours <u>9-19-00</u> Time Date</p>					
<p><u>CO HENDERSON / Hend</u> Housing Officer's Signature</p>					

R. Shannon (Superintendent) did not find any violation in document 9-5-00. V. Mooney did not charge with #15 because document 9-5-00 was in violation. I was charged with the alleged violation because I ~~with~~ wouldn't speak about information V. Mooney wanted. I was charged because I would not do what V. Mooney wanted me to do.

DC-141 PART II C
Rev. 6-84 HEARING SUPPLEMENT
INMATE VERSION AND WITNESS STATEMENTS


COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS

DC Number	Name	Institution	No. from PART I
DD-3483	Culver, BRETT	SCI-MAH	A-212770

INMATE'S VERSION

Statement of allegation is a isolated partial of a statement being twisted out of context to which it was presented. Also, this isolated partial being twisted out of context has been ALTERED from its original text, as it is rendered in #A212770. Even out of context this isolated partial implies no threat to anyone. In context presented in the two form documentation sent to R. Shannon 9-5-00, this document was a Proclamation. Due to Administrative hostilities and refusal to address violations being committed against my person, I Proclaimed, as to the context, that I am not responsible for any of the issues or situations I have been forced to seek relief for or resolution to. And regardless of the Administrative Official threats to stop pursuing these issues of complaint, I am not accountable (or responsible) for any actions on my part or efforts to secure relief. "I" am not responsible for these situations or violations being committed against "me". (I am not accountable.) I also Proclaimed that because of Administrative Corruption, retaliation, and refusal to address/Process these issues, I would not be submitting anymore issues to the authority of this Administration. Superintendent R. Shannon received this documentation (for record) and sent a copy to (?) to have the ISSUES OF COMPLAINT investigated. There was no "alleged Threat" by Superintendent R. Shannon concerning the document. Superintendent R. Shannon is in a position and knowledgable enough to know if a rule or regulation had been violated. And he would have had me charged immediately 9-5-00. But no action was taken because no rule or regulation had been violated, nor was there any Threat made on 9-11-00 Vincent Mooney did not ask me anything about a Threatening Statement as he testifies in his report. V. Mooney was enraged because I immediately told him I had nothing to say to this Administration on these issues. As Proclaimed in the Document, reasons included) V. Mooney was asking about names of employees referred to in the Document "ONLY". I again told him I had nothing to say, all issues are being handled by outside agencies. In page V. Mooney had me sent to RHV. V. Mooney's report ~~implies~~ implies that Mr. Shannon is not capable of reporting this alleged charge, nor is anyone else during is so-called absence 9-5-00 to 9-11-00. The Proclamation Document itself was specifically written for Court Actions being pursued on these issues contained. There is no threat

35 Q.

DC-135A		RECEIVED COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS SEP 07 2000 INSTRUCTIONS <i>Complete Items Number 1-7. If you follow instructions in preparing your request, it can be disposed of more promptly and intelligently.</i>	
INMATE'S REQUEST TO STAFF MEMBER			
1. TO: (NAME AND TITLE OF OFFICER)		2. DATE	
R. Shannon Superintendent		9-5-00	
3. BY: (INSTITUTIONAL NAME AND NUMBER)		4. COUNSELOR'S NAME	
- Brett Culver DD-3483		Barsh	
5. WORK ASSIGNMENT		6. QUARTERS ASSIGNMENT	
		D-1B 22	
7. SUBJECT: STATE COMPLETELY BUT BRIEFLY THE PROBLEM ON WHICH YOU DESIRE ASSISTANCE. GIVE DETAILS.			
<p>The Harassment by Officer Mikhich against me is well known among other employees at this facility. There are certain employees that inform me about conversations they have had, or heard about me from C.O. Mikhich. *Today (9-5-00) I was told by one of these employees that Officer Mikhich is actively seeking information concerning me from other employees on D-B. And this employee informed me that Officer Mikhich was making improper statements in reference to me. This involves conspiracies and stalking. *All measures of security and protection have been denied by this Administration. I desperately tried to secure relief on these issues which has been denied. I tried to secure separation protection which has also been denied to this date. Everything I have tried to do to secure relief (protection from abuse) has been denied by this Administration "and your authority." This Administration has supported, facilitated, promoted, and endorsed all facets of harassment and hostilities against my person. I cannot be held responsible or accountable for any actions on my part that might occur related to these situations being deliberately forced on my person.</p>			
8. DISPOSITION: (DO NOT WRITE IN THIS SPACE)			
<p>Provide <u>names</u> to the Security Office. Give them something to work with and your accusations will be formally investigated as they have been previously.</p> <p>Also-you most certainly <u>will</u> <u>be</u> held accountable for your actions.</p> <p>Dep. Petruccio cc: Major McGrady have his latest complaints investigated. Unit Mgr Chismar Adm Asst Dotter</p> <p style="text-align: right;">  7 Sep '00 </p>			
<input type="checkbox"/> TO DC-14 CAR ONLY		<input checked="" type="checkbox"/> TO DC-14 CAR AND DC-15 IRS	
STAFF MEMBER		DATE	

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRET T. CULVER,	:	
	:	
Plaintiff	:	
	:	
v.	:	No. 1:01-CV-0904
	:	(Judge Kane)
T. E. MIKNICH, et al.,	:	
	:	
Defendants	:	

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing Defendant Mooney's Responses to Plaintiff's Interrogatories, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Brett T. Culver, #DD-3483
SCI-Mahanoy
301 Morea Rd.
Frackville, PA 17932



**MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL**

DATE: April 3, 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BRET T. CULVER,	:	
	:	
Plaintiff	:	
	:	
v.	:	No. 1:01-CV-0904
	:	(Judge Kane)
COMMONWEALTH OF	:	(Electronically Filed)
PENNSYLVANIA, <u>et al.</u> ,	:	

CERTIFICATE OF SERVICE

I, Maryanne M. Lewis, Deputy Attorney General, hereby certify that on this date I caused to be served the foregoing **Defendants' Response to Plaintiff's Motion to Compel Discovery**, by depositing a copy of the same in the United States mail, postage prepaid, in Harrisburg, PA., addressed to the following:

Brett T. Culver, #DD 3483
SCI-Mahanoy
301 Morea Rd.
Frackville, PA 17932

s/Maryanne M. Lewis
MARYANNE M. LEWIS
DEPUTY ATTORNEY GENERAL

DATE: September 29, 2003